

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KEITH HOBBS, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

COMMONWEALTH SERVICING
GROUP, LLC, a Massachusetts limited
liability company, and DMB FINANCIAL,
LLC, a Massachusetts limited liability
company,

Defendants.

Case No. 1:19-cv-10408-NMG

CLASS ACTION

MOTION FOR PRO HAC VICE ADMISSION OF TAYLOR T. SMITH

Pursuant to Local Rule 83.5.3, the undersigned counsel, J. Steven Foley, hereby moves the Court to enter an Order granting leave to Taylor T. Smith to appear *pro hac vice* on behalf of Plaintiff Keith Hobbs (“Plaintiff” or “Hobbs”) and the alleged class in the above-captioned action. In support of this Motion, the undersigned states as follows:

1. Taylor T. Smith has been a member in good standing of the bar of the State of Colorado since 2017. Mr. Smith is also a member in good standing of the following courts: U.S. District Court for the District of Colorado, U.S. District Court for the Northern District of Illinois, U.S. District Court for the Eastern District of Michigan.
2. There are no disciplinary proceedings pending against Mr. Smith in any jurisdiction.
3. Mr. Smith has represented that he has reviewed and is familiar with the Local Rules of this Court.
4. Mr. Smith has drafted and submitted a *Certification for Admission Pro Hac Vice*,

as required.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

Counsel for Plaintiff has conferred with counsel for the Defendants and has been advised that Defendants do not oppose the relief sought.

Respectfully submitted,

Dated: May 31, 2019

By: /s/ J. Steven Foley
One of Plaintiff's Attorneys

J. Steven Foley
jsteven@attorneyfoley.com
Law Office of J. Steven Foley
11 Pleasant St. #100
Worcester, MA 01609
Phone: (508) 754-1041
Fax: (508) 739-4051

Taylor T. Smith*
Woodrow & Peluso, LLC
3900 E. Mexico Avenue, Suite 300
Denver, CO 80210
Phone: (720) 907-7628
Email: tsmith@woodrowpeluso.com

*Seeking *pro hac vice* admission

CERTIFICATE OF SERVICE

I hereby certify that the above papers were filed through the Court's ECF system, which will serve the papers electronically to all counsel of record.

/s/ J. Steven Foley